

PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS
HERETO TO DETERMINE WHETHER THIS OBJECTION
AFFECTS YOUR CLAIM(S)

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Attorneys for Motors Liquidation
Company GUC Trust

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
In re	:	Chapter 11 Case No.
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

NOTICE OF 249TH OMNIBUS OBJECTION TO CLAIMS
(Insufficient Documentation)

PLEASE TAKE NOTICE that on September 23, 2011, the Motors Liquidation Company GUC Trust (the “GUC Trust”), formed by the above-captioned debtors (collectively, the “Debtors”) in connection with the Debtors’ Second Amended Joint Chapter 11 Plan, dated March 18, 2011, filed their 249th Omnibus Objection to expunge certain claims (the “249th Omnibus Objection to Claims”), and that a hearing (the “Hearing”) to consider the 249th Omnibus Objection to Claims will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District

of New York, One Bowling Green, New York, New York 10004, on **October 28, 2011, at 9:45 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE 249th OMNIBUS OBJECTION TO CLAIMS TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN EXHIBIT "A" ANNEXED THERETO.

PLEASE TAKE FURTHER NOTICE that any responses to the 249th Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on (i) Dickstein Shapiro, LLP, attorneys for the GUC Trust, 1633 Broadway, New York, New York, 10019-6708 (Attn: Barry N. Seidel, Esq., and Stefanie Birbrower Greer, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 401 South Old Woodward Avenue, Suite 370, Birmingham, Michigan 48009 (Attn: Thomas Morrow); (iii) General Motors, LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii)

Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Robert Schmidt, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W., Suite 1100, Washington, DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.); (xi) Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Trafelet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.); (xii) Gibson, Dunn & Crutcher LLP, attorneys for Wilmington Trust Company as GUC Trust Administrator and for Wilmington Trust Company as Avoidance Action Trust Administrator, 200 Park Avenue, 47th Floor, New York, New York 10166 (Attn: Keith Martorana, Esq.); (xiii) FTI Consulting, as the GUC Trust Monitor and as the Avoidance Action Trust Monitor, One Atlantic Center, 1201 West Peachtree Street, Suite 500, Atlanta, Georgia 30309 (Attn: Anna Phillips); (xiv) Crowell & Moring LLP, attorneys for the Revitalizing Auto Communities Environmental Response Trust, 590 Madison Avenue, 19th Floor, New York, New York 10022-2524 (Attn: Michael V. Blumenthal, Esq.); and (xv) Kirk P. Watson, Esq., as the Asbestos Trust Administrator, 2301 Woodlawn Boulevard, Austin, Texas 78703, so as to be received no later

than **October 21, 2011, at 4:00 p.m. (Eastern Time)** (the “**Response Deadline**”).

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the 249th Omnibus Objection to Claims or any claim set forth thereon, the GUC Trust may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the 249th Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York
September 23, 2011

/s/ Stefanie Birbrower Greer
Barry N. Seidel (BS-1945)
Stefanie Birbrower Greer (SG-2898)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:
	:
Debtors.	: (Jointly Administered)
	:
-----X	

249TH OMNIBUS OBJECTION TO CLAIMS **(Insufficient Documentation)**

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM.
CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON THE
EXHIBIT ANNEXED TO THIS OBJECTION.**

TO THE HONORABLE ROBERT E. GERBER,
UNITED STATES BANKRUPTCY JUDGE:

The Motors Liquidation Company GUC Trust (the “**GUC Trust**”), formed by the above-captioned debtors (collectively, the “**Debtors**”) in connection with the Debtors’ Second Amended Joint Chapter 11 Plan, dated March 18, 2011 (as may be amended, supplemented, or modified from time to time, the “**Plan**”), respectfully represents:

Relief Requested

1. The GUC Trust files this 249th omnibus objection to certain claims (the “**249th Omnibus Objection to Claims**”) pursuant to section 502(b) of title 11, United States Code (the “**Bankruptcy Code**”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “**Procedures Order**”) (ECF No. 4180), and this Court’s order approving the procedures relating to the filing of proofs of claim (the “**Bar Date Order**”) (ECF No. 4079), seeking entry of an order disallowing and expunging the claims listed on **Exhibit “A”** annexed hereto.¹

2. Representatives of the GUC Trust have examined the proofs of claim identified on **Exhibit “A”** and have made every effort to ascertain the validity of such claims. After careful review, the GUC Trust has determined that the proofs of claim listed on **Exhibit “A”** (collectively, the “**Insufficient Documentation Claims**”) fail to provide sufficient documentation to ascertain the validity of such claims. In fact, these claims fail to provide any documentation whatsoever to support the requested recoveries. Thus, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and the Bar Date Order, the GUC Trust seeks entry of an order disallowing and expunging the Insufficient Documentation Claims from the claims register.

¹ Creditors can obtain copies of the cover page of any proof of claim filed against the Debtors’ bankruptcy estates on the Debtors’ claims register on the website maintained by the Debtors’ claims agent, www.motorsliquidation.com. A link to the claims register is located under the “Claims Information” tab. Creditors without access to the Internet may request a copy of the cover page of any proof of claim by mail to The Garden City Group, Inc., Motors Liquidation Company Claims Agent, P.O. Box 9386, Dublin, Ohio 43017-4286 or by calling The Garden City Group, Inc. at 1-703-286-6401.

Jurisdiction

3. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

Background

4. On June 1, 2009, four of the Debtors (the “**Initial Debtors**”)² commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, and on October 9, 2009, two additional Debtors (the “**REALM/ENCORE Debtors**”)³ commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, which cases are jointly administered with those of the Initial Debtors under Case Number 09-50026 (REG). On September 15, 2009, the Initial Debtors filed their schedules of assets and liabilities and statements of financial affairs, which were amended on October 4, 2009. On October 15, 2009, the REALM/ENCORE Debtors filed their schedules of assets and liabilities and statements of financial affairs.

5. On September 16, 2009, this Court entered an order (ECF No. 4079) establishing November 30, 2009 as the deadline for each person or entity to file a proof of claim in the Initial Debtors’ cases, including governmental units. On December 2, 2009, this Court entered an order (ECF No. 4586) establishing February 1, 2010 as the deadline for each person or entity to file a proof of claim in the REALM/ENCORE Debtors’ cases (except governmental units, as defined in section 101(27) of the Bankruptcy Code, for which the Court established April 16, 2010 as the deadline to file proofs of claim). On October 6, 2009, the Court entered the Procedures Order. The Procedure Order authorizes the Debtors, among other things, to file omnibus objections to no more than 100 claims at a time, under various grounds, including those

² The Initial Debtors are MLC, MLCS, LLC (f/k/a Saturn, LLC), MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation), and MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc.).

³ The REALM/ENCORE Debtors are Remediation and Liability Management Company, Inc., and Environmental Corporate Remediation Company, Inc.

set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

6. On March 29, 2011, this Court entered an order confirming the Plan (ECF No. 9941). Section 6.2 of Article VI of the Plan, entitled “*The GUC Trust*,” provides for the creation of the GUC Trust to administer certain responsibilities after the Effective Date (as defined in the Plan), including resolving outstanding Disputed General Unsecured Claims (as defined in the Plan). All conditions to the occurrence of the Effective Date were met or waived on March 31, 2011, thereby making the Plan effective as of that date.

The Relief Requested Should Be Approved by the Court

7. A proof of claim *must* “set forth the facts necessary to support the claim” for it to receive the prima facie validity accorded under the Bankruptcy Rules. *In re Chain*, 255 B.R. 278, 280 (Bankr. D. Conn. 2000) (internal quotation omitted); *In re Marino*, 90 B.R. 25, 28 (Bankr. D. Conn. 1988); *see Ashford v. Consol. Pioneer Mortgage*, 178 B.R. 222, 226 (9th Cir. B.A.P. 1995), *aff’d*, 91 F.3d 151 (9th Cir. 1996); *In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173-74 (3d Cir. 1992).

8. The Bar Date Order requires, among other things, that a proof of claim must “set forth with specificity the legal and factual basis for the alleged [c]laim [and] include supporting documentation or an explanation as to why such documentation is not available.” (Bar Date Ord. at 2.) The Insufficient Documentation Claims fall well-short of this standard, as they do not include any documentation to ascertain the nature or validity of such claims. As a result, the GUC Trust does not have sufficient information to evaluate these claims. Thus, the GUC Trust requests that the Court disallow and expunge the Insufficient Documentation Claims.

9. The GUC Trust reserves all of their rights to object on any other basis to any Insufficient Documentation Claims as to which the Court does not grant the relief requested herein.

Notice

10. Notice of this 249th Omnibus Objection to Claims has been provided to each claimant listed on **Exhibit "A"** and parties in interest in accordance with the Sixth Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures, dated May 5, 2011 (ECF No. 10183). The GUC Trust submits that such notice is sufficient and no other or further notice need be provided.

11. No previous request for the relief sought herein has been made by the GUC Trust to this or any other Court.

WHEREFORE the GUC Trust respectfully requests entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: New York, New York
September 23, 2011

/s/ Stefanie Birbrower Greer
Barry N. Seidel (BS-1945)
Stefanie Birbrower Greer (SG-2898)

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Attorneys for Motors Liquidation
Company GUC Trust

249th Omnibus Objection

Exhibit A

Motors Liquidation Company, et al.
Case No. 09-50026 (REG), Jointly Administered

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
ACORD, ORA L 3461 SAINT MARYS RD APT 202 W TERRE HAUTE, IN 47885-9685	16306	Motors Liquidation Company		Insufficient Documentation	Pg. 4
Unliquidated					
ALICE J OSBORNE 909 ST MATTHEW DR CAHOKA, IL 62206 UNITED STATES OF AMERICA	7225	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$3,000.00 (U)		
			\$3,000.00 (T)		
ALICE ZITTEL 426 MINNESOTA AVE SAINT PAUL, MN 55113	8712	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$10,160.00 (U)		
			\$10,160.00 (T)		
ANTHONY F BURTON 170 HEMPSTEAD DR SOMERSET, NJ 08873-3952	33043	Motors Liquidation Company	\$14,220.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$5,000.00 (P)		
			\$0.00 (U)		
			\$19,220.00 (T)		
AUSTIN W & DOROTHY GREGORY 1653 JULIE LN ALMA, AR 72921	22195	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$2,000.00 (U)		
			\$2,000.00 (T)		

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
AWERBUCH MD PLLC 5889 BAY RD STE 104 SAGINAW, MI 48604-2539	7566	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$98,000.00 (U)		
			\$98,000.00 (T)		
			Unliquidated		
B L DOWNEY COMPANY INC 2125 GARDNER RD BROADVIEW, IL 60155-2826	62361	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$1,200.00 (U)		
			\$1,200.00 (T)		
BARTKOSKI, ROSE 6426 TROUP AVE KANSAS CITY, KS 66102-1058	12535	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$2,759.53 (U)		
			\$2,759.53 (T)		
BARTLETT PROPERTY MANAGEMENT ATTN: CORPORATE OFFICER/AUTHORIZED AGENT 2017 30TH ST BEDFORD, IN 47421-5409	23666	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$15,954.45 (U)		
			\$15,954.45 (T)		
			Unliquidated		
BILLIE L HORINE AND DEBORAH M MAGEE JTWROS 514 E CEDAR ST OLATHE, KS 66061-4767	4381	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$20,465.00 (U)		
			\$20,465.00 (T)		

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
BOOKER, PAUL W 7307 GRAYDON DR NORTH TONAWANDA, NY 14120-1494	5978	Motors Liquidation Company		Insufficient Documentation	Pg. 4
Unliquidated					
BOOSE, EARL L 2466 TATUM RD HICKORY, MS 39332-3203	19112	Motors Liquidation Company		Insufficient Documentation	Pg. 4
Unliquidated					
BRUMLEY, SHARON EXECUTOR OF THE ESTATE OF FONEE BRUMLEY DECEASED ATTN JAMES H FURMAN ESQ BYRD DAVIS FURMAN LLP 707 WEST 34TH STREET AUSTIN, TX 78705-1294	7458	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$1,000,000.00 (U) \$1,000,000.00 (T)	Insufficient Documentation	Pg. 4
BRYANT JR, JAMES O 6 LAWRENCE DR APT B BROWNS MILLS, NJ 08015-1754	4171	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$25,000.00 (U) \$25,000.00 (T) Unliquidated	Insufficient Documentation	Pg. 4
CHARLES AND JOAN HASSINK 10256 SPINNAKER RUN REMINDERVILLE, OH 44202-8109 UNITED STATES OF AMERICA	4642	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$3,500.00 (U) \$3,500.00 (T)	Insufficient Documentation	Pg. 4

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
CLARK, JERRY L PO BOX 32 UNION CHURCH, MS 39668-0032	23561	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$9,000.00 (U)		
			\$9,000.00 (T)		
CONSTANCE STIDHAM 888 TOWNSHIP ROAD 53 WEST SALEM, OH 44287	70951	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$5,000.00 (A)		
			\$0.00 (P)		
			\$0.00 (U)		
			\$5,000.00 (T)		
COVELL, MARY J 19613 E 9TH ST S INDEPENDENCE, MO 64056-3088	4494	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$500.00 (U)		
			\$500.00 (T)		
CROSS, ROBERT W 310 75TH AVE N APT 8 MYRTLE BEACH, SC 29572-4205	14124	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$3,167.36 (U)		
			\$3,167.36 (T)		
CURT JACOBUS AS PR OF THE ESTATE OF CATHERINE ANN GALEY RONNIE L CROSBY ESQUIRE PETERS MURDAUGH PARKER ELTZROTH & DETRICK PA PO BOX 457 HAMPTON, SC 29924	60034	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$5,000,000.00 (U)		
			\$5,000,000.00 (T)		

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
DAVID A FRANKEL 529 OLD GREEN BAY RD GLENCOE, IL 60022	10772	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$65,000.00 (U) \$65,000.00 (T)	Insufficient Documentation	Pg. 4
DAVID SCHEIBE 634 HURON ROMEONVILLE, IL 60446-1284	69975	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$6,000.00 (U) \$6,000.00 (T)	Insufficient Documentation	Pg. 4
DAVID WIRTH 11012 W MOUNTAIN VIEW RD SUN CITY, AZ 85351-4660	6159	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$2,028.00 (P) \$0.00 (U) \$2,028.00 (T)	Insufficient Documentation	Pg. 4
DCG & T FBO SALVATORE SCARANTINO/IRA SALVATORE SCARANTINO 37 CONCERTO DR LAKE GROVE, NY 11755-1312	2761	Motors Liquidation Company	\$10,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$10,000.00 (T)	Insufficient Documentation	Pg. 4
DENNIS M O'DELL 49 WOODSON BEND RESORT BRONSTON, KY 42518	45561	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$199,210.00 (U) \$199,210.00 (T)	Insufficient Documentation	Pg. 4
DENOON, JUDITH J 1112 S VALLEY RD OLATHE, KS 66061-3966	15602	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$39,000.00 (U) \$39,000.00 (T)	Insufficient Documentation	Pg. 4

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Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
DONALD SHERMAN 37 PEACH BLOSSOM CIR SANFORD, NC 27332-1307 UNITED STATES OF AMERICA	32853	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$78,338.87 (U) \$78,338.87 (T)	Insufficient Documentation	Pg. 4
DOROTHY KING 5705 SKYLINE DR SEVEN HILLS, OH 44131-1952	4186	Motors Liquidation Company		Insufficient Documentation	Pg. 4
			Unliquidated		
ELAINE K STREDNEY 3154 DEER TRL UNIT D CORTLAND, OH 44410-9273	5422	Motors Liquidation Company		Insufficient Documentation	Pg. 4
			Unliquidated		
ESTATE OF KENNETH REYNOLDS SANDRA REYNOLDS EXECUTRIX 21 - PINE HURST CIRCLE ANNANDALE, NJ 08801-1655	22233	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$24,000.00 (U) \$24,000.00 (T)	Insufficient Documentation	Pg. 4
FLORENCE SMOTHERMAN 108 JUDD CT NASHVILLE, TN 37218	69674	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$25,818.18 (U) \$25,818.18 (T)	Insufficient Documentation	Pg. 4

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249th Omnibus Objection

Exhibit A

Motors Liquidation Company, et al.
Case No. 09-50026 (REG), Jointly Administered

CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
FLORIAN BARTOSCHIK URNENRING 5 93309 KELHEIM GERMANY	33278	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$4,000.00 (U)		
			\$4,000.00 (T)		
FOSTER, SYLVIA PO BOX 633 GRAYSON, KY 41143-0633	49657	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$10,000.00 (U)		
			\$10,000.00 (T)		
FUNAN HSU 10262 JACARANDA CT RANCHO CUCAMONGA, CA 91737	7568	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$137,637.50 (U)		
			\$137,637.50 (T)		
GARY DIXON 14263 ZORZAL FORT PIERCE, FL 34951-4257	19484	Motors Liquidation Company		Insufficient Documentation	Pg. 4
			Unliquidated		
GLENDA REMEDIES PO BOX 65 ZWOLLE, LA 71486	70889	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$1,500.00 (A)		
			\$0.00 (P)		
			\$0.00 (U)		
			\$1,500.00 (T)		

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GWENDOLYN MILLER 5713 HILLARY ST. TROTWOOD, OH 45426 UNITED STATES OF AMERICA	21643	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$146,900.00 (U) \$146,900.00 (T)	Insufficient Documentation	Pg. 4
HARR, CAROL D 3666 WAGONWHEEL RD EDMOND, OK 73034-5814	6837	Motors Liquidation Company		Insufficient Documentation	Pg. 4
			Unliquidated		
HATCH, ZITA M 1825 WILLOW CREEK DRIVE LANSING, MI 48917-7810	4372	Motors Liquidation Company		Insufficient Documentation	Pg. 4
			Unliquidated		
HORNE, QUANDIA 16 KINGSWAY RD APT D ASHEBORO, NC 27203	69682	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$10,702.00 (U) \$10,702.00 (T)	Insufficient Documentation	Pg. 4
HYTLA, EDWARD J 11 E 32ND ST C/O EDWARD F DANIELS ATLANTIC, IA 50022-2573	4968	Motors Liquidation Company		Insufficient Documentation	Pg. 4
			Unliquidated		

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JAMES & EVELYN BAILY REV TRUST EVELYN BAILY TTEE U/A DTD 8/31/94 622 CLOVERVIEW CIR PITTSBURGH, PA 15239-2370	6842	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$3,300.00 (U) \$3,300.00 (T)	Insufficient Documentation	Pg. 4
JAMES E NEFF 538 JODEE DR. XENIA, OH 45385-5912	14306	Motors Liquidation Company		Insufficient Documentation	Pg. 4
			Unliquidated		
JAMES KENNEDY 7971 N NC HIGHWAY 150 LEXINGTON, NC 27295-9388	23369	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$1,957.94 (U) \$1,957.94 (T)	Insufficient Documentation	Pg. 4
JAMES N MIZE 3505 SHADY OAKS OLIVE BRANCH, MS 38654-7893	4175	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$50,000.00 (U) \$50,000.00 (T)	Insufficient Documentation	Pg. 4
JAMES STIDHAM 888 TOWNSHIP ROAD 53 WEST SALEM, OH 44287	70950	Motors Liquidation Company	\$0.00 (S) \$10,000.00 (A) \$0.00 (P) \$0.00 (U) \$10,000.00 (T)	Insufficient Documentation	Pg. 4

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JANET C DICKHERBER 1950 WOODLAND CT WENTZVILLE, MO 63385-2651	38955	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$1,182.65 (U) \$1,182.65 (T)	Insufficient Documentation	Pg. 4
JEROME FARBER 7802 LAKESIDE BLVD APT 734 BOCA ROTON, FL 33434	12173	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$26,000.00 (U) \$26,000.00 (T)	Insufficient Documentation	Pg. 4
JERRY C DAVIDSON TTEE MANESS FAMILY TRUST C/O JERRY C DAVIDSON TTEE 2866 FOXFIRE DR ST LOUIS, MO 63129-3511	11002	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$1,928.66 (U) \$1,928.66 (T)	Insufficient Documentation	Pg. 4
JOHN AND FRANCES FRANCATI 205 SANDRA DR SYRACUSE, NY 13212	8415	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$15,000.00 (U) \$15,000.00 (T)	Insufficient Documentation	Pg. 4
JOHN BUTE 2328 E FINLEY ST GILBERT, AZ 85296-1535 UNITED STATES OF AMERICA	9420	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$15,000.00 (U) \$15,000.00 (T)	Insufficient Documentation	Pg. 4
JOHN J NAPPI 58 CHANCELLOR PARK DR MAYS LANDING, NJ 08330-2049	26611	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$5,000.00 (U) \$5,000.00 (T)	Insufficient Documentation	Pg. 4

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JOHN K. SWART 199 WESTWOOD RD #1 SHARON, CT 06069	28044	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$15,028.26 (U) \$15,028.26 (T)	Insufficient Documentation	Pg. 4
JOHN TARANTINO JR 4300 RIVERSIDE DR LOT 114 PUNTA GORDA, FL 33982-1791	4252	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$9,250.00 (U) \$9,250.00 (T)	Insufficient Documentation	Pg. 4
JOYCE CHANADET TTEE 977 WIND FLOWER RD BEAUMONT, CA 92223	45072	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$1,500.00 (U) \$1,500.00 (T)	Insufficient Documentation	Pg. 4
KAY A HINES 929 CUSTER PL DAYTON, OH 45417-3728	61765	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$50,000.00 (U) \$50,000.00 (T)	Insufficient Documentation	Pg. 4
KING, DOROTHY E 5705 SKYLINE DR SEVEN HILLS, OH 44131-1952	4185	Motors Liquidation Company		Insufficient Documentation	Pg. 4
			Unliquidated		

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249th Omnibus Objection

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KNISLEY DEBRAH KNISLEY DEBRAH 3347 HERBERT ST MOGADORE, OH 44260-1017	26620	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$4,000.00 (U)		
			\$4,000.00 (T)		
LAPORTE JR ALPHONSE J 5858 NAPLES DR ZEPHYRHILLS, FL 33540-8553	29541	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$37,000.00 (U)		
			\$37,000.00 (T)		
LEIGH, GLORIA L 284 WAKEFIELD RD DAYTON, OH 45440-4435	4593	Motors Liquidation Company		Insufficient Documentation	Pg. 4
			Unliquidated		
LISA KOZUCH CZYZYK	19482	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$32,000.00 (U)		
			\$32,000.00 (T)		
LOPEZ, MINERVA E 1826 BOTTLE BRUSH WAY NORTH PORT, FL 34289	19032	Motors Liquidation Company		Insufficient Documentation	Pg. 4
			Unliquidated		

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LOTHAR JESIEN FRANKFURTER STRASSE 19 74072 HEILBRONN GERMANY	20876	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$5,000.00 (U)		
			\$5,000.00 (T)		
LYNNE O. ELKIN 2690 MOUNTAINGATE WAY OAKLAND, CA 94611	20830	Motors Liquidation Company	\$0.00 (S)	Insufficient Documentation	Pg. 4
			\$0.00 (A)		
			\$0.00 (P)		
			\$242.33 (U)		
			\$242.33 (T)		
MARCIA TAUBER 460 KILMER WAY THE VILLAGES, FL 32162	70802	Motors Liquidation Company		Insufficient Documentation	Pg. 4
MARGARET A YARNELL 221 COUNTY ROAD 513 GLEN GARDNER, NJ 08826-3214	22011	Motors Liquidation Company	Unliquidated	Insufficient Documentation	Pg. 4
			\$0.00 (S)		
			\$0.00 (A)		
			\$0.00 (P)		
			\$7,620.80 (U)		
MARSHALL E FRANK 601 AVON CT WASHINGTON, IL 61571	70626	Motors Liquidation Company	\$7,620.80 (T)	Insufficient Documentation	Pg. 4

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MC DANIEL JR., PRENTISS A 7407 S VERNON AVE CHICAGO, IL 60619-1813	4343	Motors Liquidation Company		Insufficient Documentation	Pg. 4
Unliquidated					
MICHAEL BARTON C/O KATHERINE M LOOS, LLC ATTN KATHERINE M LOOS, ATTORNEY AT LAW PO BOX 51345 LAFAYETTE, GA 70505-1345	70932	Motors Liquidation Company		Insufficient Documentation	Pg. 4
Unliquidated					
MICHAEL LONG 9550 WASHINGTON CHURCH RD MIAMISBURG, OH 45342-4549	18055	Motors Liquidation Company		Insufficient Documentation	Pg. 4
Unliquidated					
MIGUEL ALTUNA P DUQUE DE BAENA 40-201ZQ 20009 SAN SEBASTIAN SPAIN	61847	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$124,555.20 (U) \$124,555.20 (T)	Insufficient Documentation	Pg. 4
Unliquidated					
MINTO, JOHN W 10 5TH ST ELIZABETH, NJ 07206-1102	18768	Motors Liquidation Company		Insufficient Documentation	Pg. 4
Unliquidated					

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MYERS, JIMMIE 2727 E WYNNTON LN COLUMBUS, GA 31906-2166	19483	Motors Liquidation Company		Insufficient Documentation	Pg. 4
			Unliquidated		
NOLIE V BURTON 1002 N WARD RD RAYMORE, MO 64083-9601	17969	MLCS, LLC	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$3,000.00 (U) \$3,000.00 (T)	Insufficient Documentation	Pg. 4
			Unliquidated		
PADGETTE, GERI 110 GREEN ACRES LN SPRINGHILL, LA 71075-5030	28498	Motors Liquidation Company		Insufficient Documentation	Pg. 4
			Unliquidated		
PATRICIA RACHECK 3324 COUNTY LINE RD W FARMINGTON, OH 44491-9772	7827	Motors Liquidation Company		Insufficient Documentation	Pg. 4
			Unliquidated		
PAUL FLEMING 3338 TAYLOR ST DETROIT, MI 48206-1989	19147	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$55,251.00 (U) \$55,251.00 (T)	Insufficient Documentation	Pg. 4

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PAUL G KANE 1604 ASHLAND HASTINGS, MN 55033	71037	Motors Liquidation Company	\$0.00 (S) \$4,740.00 (A) \$0.00 (P) \$0.00 (U) \$4,740.00 (T)	Insufficient Documentation	Pg. 4
PI-JUI YU 10262 JACARANDA CT RANCH CUCAMONGA, CA 91737	4840	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$105,422.50 (U) \$105,422.50 (T)	Insufficient Documentation	Pg. 4
POWELL, LUCY O/B/O CASSIE DIMAURO AND INDIVIDUALLY 6282 COUNTRY RD 690 QUITMAN, MS 39355-8992	7442	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$1,000,000.00 (U) \$1,000,000.00 (T)	Insufficient Documentation	Pg. 4
REYNOLDS CODY C/O DAVID SLAUGHTER 17225 EL CAMINO REAL STE 315 HOUSTON, TX 77058-2739	38304	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$15,317.86 (U) \$15,317.86 (T)	Insufficient Documentation	Pg. 4
RILEY DARRYLL 8677 SHERATON DR FAIR OAKS, CA 95628-2918	5349	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$8,947.87 (U) \$8,947.87 (T)	Insufficient Documentation	Pg. 4
ROGER AND NANCY SMITH 823 COLCHESTER DR OSWEGO, IL 60543	14821	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$50,000.00 (U) \$50,000.00 (T)	Insufficient Documentation	Pg. 4

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SABATKA, SHARON M 1033 S MERIDIAN RD YOUNGSTOWN, OH 44511-1131	16577	Motors Liquidation Company		Insufficient Documentation	Pg. 4
Unliquidated					
SALLY M MARTINEZ 59 CR 545 ESPANOLA, NM 87532 UNITED STATES OF AMERICA	44251	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$12,000.00 (U) \$12,000.00 (T)	Insufficient Documentation	Pg. 4
SANDRA REYNOLDS 21 PINEHURST CIR ANNANDALE, NJ 08801-1655	22120	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$24,000.00 (U) \$24,000.00 (T)	Insufficient Documentation	Pg. 4
SAUERS, RONALD E 3667 BORDEAU RD STANDISH, MI 48658-9494	2822	Motors Liquidation Company		Insufficient Documentation	Pg. 4
Unliquidated					
SKIDMORE, TAMMY 8525 DR MARTIN LUTHER KING JR ST N ST PETERSBURG, FL 33702-3505	3895	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$48,904.24 (U) \$48,904.24 (T)	Insufficient Documentation	Pg. 4

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SNIDER CHRISTOPHER SNIDER, CHRISTOPHER 1920 NORTH MAIN SUITE 214 NORTH LITTLE ROCK, AR 72114-2875	28995	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$8,474.75 (U) \$8,474.75 (T)	Insufficient Documentation	Pg. 4
STEVEN ANDERSON 9533 CASS AVE TAYLOR, MI 48180-3508	65417	Motors Liquidation Company	\$230,000.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U) \$230,000.00 (T)	Insufficient Documentation	Pg. 4
STRUL FLANDEL SQ ED MACHTENS 18 13 1080 BRUXELLES BELGIUM	63034	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$51,525.45 (U) \$51,525.45 (T)	Insufficient Documentation	Pg. 4
TAYLOR, LYNETTE WINBURN LEWIS BARROW STOLZ PC 279 MEIGS ST ATHENS, GA 30601-2427	3632	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$6,416.58 (U) \$6,416.58 (T)	Insufficient Documentation	Pg. 4
THOMAS E KINDRED & JUDITH KINDRED JT TEN ENT 10291 W HWY 40 OCALA, FL 34482-2567	5511	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$250,000.00 (U) \$250,000.00 (T)	Insufficient Documentation	Pg. 4

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CLAIMS TO BE DISALLOWED AND EXPUNGED

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference
THOMAS. DEMORRIS C/O WILEY DEMORRIS 2531 MORNING GLORY LN LAWRENCEVILLE, GA 30044-7308	5579	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$140,056.12 (U) \$140,056.12 (T)	Insufficient Documentation	Pg. 4
WELLS FARGO BANK ROLLOVER C/F TERRILL L BROBST 211 W PLAINS DR OREANA, IL 62554-9757	65277	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$250.00 (U) \$250.00 (T)	Insufficient Documentation	Pg. 4
WILLIAMS, DONALD 3606 XERXES AVE N MINNEAPOLIS, MN 55412-1850	65904	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$10,000.00 (U) \$10,000.00 (T)	Insufficient Documentation	Pg. 4
WILSON TONY 1920 NORTH MAIN SUITE 214 NORTH LITTLE ROCK, AR 72114	28994	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$8,093.36 (U) \$8,093.36 (T)	Insufficient Documentation	Pg. 4
CLAIMS TO BE DISALLOWED AND EXPUNGED			97	\$254,220.00 (S) \$21,240.00 (A) \$7,028.00 (P) \$9,144,538.46 (U) \$9,427,026.46 (T)	

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : **Chapter 11 Case No.**
:
MOTORS LIQUIDATION COMPANY, et al., : **09-50026 (REG)**
f/k/a General Motors Corp., et al. :
:
Debtors. : **(Jointly Administered)**
:
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ORDER GRANTING THE 249TH OMNIBUS OBJECTION TO CLAIMS
(Insufficient Documentation)

Upon the 249th omnibus objection to expunge certain claims, dated September 23, 2011 (the “**249th Omnibus Objection to Claims**”), of the Motors Liquidation Company GUC Trust (the “**GUC Trust**”), formed by the above-captioned debtors (collectively, the “**Debtors**”) in connection with the Debtors’ Second Amended Joint Chapter 11 Plan, dated March 18, 2011 (as may be amended, supplemented, or modified from time to time, the “**Plan**”), pursuant to section 502(b) of title 11, United States Code (the “**Bankruptcy Code**”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), this Court’s order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the “**Procedures Order**”) (ECF No. 4180), and this Court’s order approving the procedures relating to the filing of proofs of claim (the “**Bar Date Order**”) (ECF No. 4079), seeking entry of an order disallowing and expunging the Insufficient Documentation Claims¹ listed on the Order Exhibit (as defined below) on the grounds that such claims fail to provide sufficient documentation to ascertain the validity of the claims, all as more fully described in the

¹ Capitalized terms used but not defined herein shall have the respective meanings ascribed to them in the 249th Omnibus Objection.

249th Omnibus Objection to Claims; and due and proper notice of the 249th Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the 249th Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the 249th Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the 249th Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on **Exhibit "A"** (the "**Order Exhibit**") annexed hereto are disallowed and expunged; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object on any basis are expressly reserved with respect to any claim listed on **Exhibit "A"** annexed to the 249th Omnibus Objection to Claims that is not listed on the Order Exhibit annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York
_____, 2011

United States Bankruptcy Judge